

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually and on behalf of all others similarly situated,)	
)	
Plaintiff,)	
)	
v.)	
)	
SONUS NETWORKS, INC., HASSAN AHMED, PH.D. AND STEPHEN NILL,)	
)	
Defendants.)	
)	

Civ. Action No. 04-10294 DPW

**DEFENDANTS SONUS NETWORK, INC.'S AND HASSAN AHMED'S ASSENTED-TO
MOTION FOR LEAVE TO FILE REPLY MEMORANDUM IN SUPPORT OF MOTION
FOR RECONSIDERATION OF ORDER DENYING MOTIONS TO DISMISS OR, IN
THE ALTERNATIVE, TO CERTIFY ORDER FOR INTERLOCUTORY APPEAL**

Pursuant to Local Rule 7.1(B)(3) of the District of Massachusetts, defendants Sonus Networks, Inc. and Hassan Ahmed (collectively, "Defendants") respectfully move for leave to file the accompanying reply memorandum of law in support of their Motion for Reconsideration of Order Denying Motions to Dismiss or, in the Alternative, to Certify Order for Interlocutory Appeal. In support of this motion, Defendants submit that a brief reply is necessary to respond to erroneous assertions and arguments made in Plaintiff's opposition, and that they believe the reply will assist the Court in its resolution of the pending motion. Plaintiff has assented to this motion.

WHEREFORE, Defendants move, with the assent of counsel for the Lead Plaintiff, that the Court grant the defendants leave to file the accompanying reply brief.

Respectfully Submitted,

/s/ James W. Prendergast

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Dated: June 8, 2006

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Dated: June 8, 2006

Counsel for Defendant Hassan M. Ahmed

DEFENDANTS' LOCAL RULE 7.1(A)(2) CERTIFICATION

Pursuant to Local Rule 7.1(A)(2), counsel for defendants Sonus Networks, Inc. hereby certifies that he conferred in good faith with opposing counsel regarding Defendants' Sonus Networks, Inc.'s and Hassan Ahmed's Motion for Leave to File Reply Memorandum in Support of Motion for Reconsideration of Order Denying Motions to Dismiss or, in the Alternative, to Certify Order for Interlocutory Appeal. Plaintiff's counsel assented to Defendants' request to file a reply memorandum.

/s/ James W. Prendergast
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Counsel for Defendant Sonus Networks, Inc.

CERTIFICATE OF SERVICE

On June 8, 2006, I caused a copy of this Document to be served by electronic mail via the electronic filing system upon all counsel of record.

Dated: June 8, 2006

/s/ James W. Prendergast
James W. Prendergast